

Part C State Annual Performance Report (APR) for Federal Fiscal Year (FFY) 2006

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Overview of the Annual Performance Report Development:

The Massachusetts Part C Annual Performance Report was developed with broad stakeholder input using information from numerous data sources. The Massachusetts Data Sources consist of the Early Intervention Information System (EIS) which captures specific client -based registration, evaluation, IFSP & Discharge data; the client based service delivery system which captures service payer, discipline, type of service, etc.; the Annual Report/Self Assessment which is a key piece of data gathering for federal and state reporting requirements; Focused Monitoring Site Visits which summarize results and findings of onsite visits in the priority areas of Transition and Service Coordination; and Contract Performance Measures which monitor and evaluate vendor and program contract activities. Data for each Indicator was reviewed for accuracy and reliability.

An overview of the State Performance Plan/Annual Performance Report highlighting data for each Indicator and allowing opportunity for input on targets, improvement activities, timelines and resources was provided at the state ICC Meeting held on January 10, 2008. In addition, public input was sought through Focused Monitoring Stakeholders and Family Outcomes Stakeholders groups with broad representation from parents, EI program directors, DPH staff and EI vendors.

The Lead Agency publicly report local program data on the State Performance Plan Indicators 1, 2, 5, 6, 7 and 8. Local program reports were disseminated to each Early Intervention Program highlighting Program Performance on each indicator, comparison to the State Target, the difference between program performance and state target and the EIPs performance compared to Similar Program Grouping. Massachusetts Early Intervention Programs are grouped by size. Five groups were identified based on the cumulative number of children with IFSPs in a Fiscal Year. In addition, local program data on State Performance Plan Indicators was be posted on the Lead Agency Website.

Monitoring Priority: Early Intervention Services In Natural Environments

Indicator 1: Percent of infants and toddlers with IFSPs who receive the early intervention services on their IFSPs in a timely manner.

(20 U.S.C. 1416(a)(3)(A) and 1442)

Measurement: Percent = [(# of infants and toddlers with IFSPs who receive the early intervention services on their IFSPs in a timely manner) divided by the (total # of infants and toddlers with IFSPs)] times 100.

Account for untimely receipt of services.

| FFY | Measurable and Rigorous Target |
|--------------------------------------------------------|--------------------------------|
| FFY 2006 (July 1,2006 - June 30,2007) | 100% |

Actual Target Data for FFY 2006 (July 1, 2006 – June 30, 2007):

ORIGINAL SUBMISSION

93.7% of IFSP services were provided in a timely manner based on 3,328 services out of 3,553 of all new services listed on the IFSPs. Of these services representing 590 infants and toddlers, 438 or 74.2% received early intervention in a timely manner. Massachusetts defines “timely services” as those that begin within, and do not exceed, 30 days of the IFSP signature date.

REVISION

The Lead Agency incorrectly reported for services that were not compliant but had justification. A data field documenting extraordinary circumstances (such as family request, family schedule, child hospitalized, unable to contact family, and no shows) was not included in our original calculations. The revision for this indicator shows a significant improvement from last year in Massachusetts' data reported under this indicator.

The percentage of infants and toddlers receiving IFSP services in a timely manner is 86.8% not 74.2% as reported in the originally submitted State Part C Annual Performance Report for FFY 2006 . The percentage of timely services is 97.0% not 93.7%.

The target data was obtained through state monitoring data, FY 2007 Annual Report/Self-Assessment, from 59 Early Intervention programs (ten files per program). The calculation is based on every IFSP service identified on the Initial, Annual and IFSP Reviews, collected for each child and represents the percent of services that are timely and the percent of infants and toddlers who receive 100% of early intervention services on their IFSPs in a timely manner.

The FY 2007 Annual Report/Self-Assessment, Timeliness of Services Survey grid below provides a breakdown of the number of services and infants and toddlers who received services in a timely manner.

ORIGINAL SUBMISSION

FFY 2006 (2006-2007)/State FY 2007

Data source: FY 2007 Annual Report/Self-Assessment, Timeliness of Services Survey

THIS YEAR (FY 2007)

| Category | Children | | Services | |
|---------------------------|----------|--------|----------|--------|
| | # | % | # | % |
| Yes | 438 | 74.2% | 2,864 | 80.6% |
| No, but acceptable reason | | | 464 | 13.1% |
| No | 152 | 25.8% | 225 | 6.3% |
| Total | 590 | 100.0% | 3,553 | 100.0% |

Total compliant 438 74.2% 3,328 93.7%

REVISION

THIS YEAR (FY07)

| Category | Children | | Services | |
|---------------------------|----------|--------|----------|--------|
| | # | % | # | % |
| Yes | 512 | 86.8% | 2,864 | 80.6% |
| No, but acceptable reason | | | 583 | 16.4% |
| No | 78 | 13.2% | 106 | 3.0% |
| Total | 590 | 100.0% | 3,553 | 100.0% |

Total compliant 512 86.8% 3,447 97.0%

LAST YEAR (FY 2006)

| Category | Children | | Services | |
|---------------------------|----------|--------|----------|--------|
| | # | % | # | % |
| Yes | 450 | 74.0% | 2,572 | 85.6% |
| No, but acceptable reason | | | 183 | 6.1% |
| No | 158 | 26.0% | 251 | 8.3% |
| Total | 608 | 100.0% | 3,006 | 100.0% |

Total compliant 450 74.0% 2,755 91.7%

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2006:

The methodology for collecting data for Indicator #1 remained the same as last year. However, the FY 2007 Annual Report/Self-Assessment was revised to automatically calculate the 30 day timeframe.

The data revision impacts the numbers reported in the Explanation of Progress or Slippage that occurred for FFY 2006.

In the FFY 2005 APR, the Lead Agency staff reported the percentage of early intervention services (91.7%) that were identified on the IFSP that were provided in a timely manner. Based on guidance

Massachusetts

State

and clarification from OSEP, Massachusetts is reporting both the percentage of early intervention services that are timely (**97.0%**) and the percentage of infants and toddlers who receive 100% of their services within the states definition of timely (**86.8%**) for the FFY 2006 APR.

Massachusetts defines "timely services" as those that begin within, and do not exceed, 30 days of the IFSP signature date. Programs are encouraged to make good faith efforts to begin services immediately following the date of the IFSP signature.

Of the 3,553 services counted as being timely, **583** were late due to documented extraordinary family circumstances such as family request, family cancelled, other family situation (moved, vacation, illness) or difficulty contacting the family. The reason for delays that were documented as staff scheduling, staff shortages, or program staffing issues were considered noncompliant. The grid below provides a further breakdown of the number of days an early intervention service was provided beyond 30 days of the IFSP signature.

ORIGINAL SUBMISSION

Non-Compliance

| Category | # Services |
|----------------------------------------------|------------|
| 0 to 5 days beyond compliance | 41 |
| 6 to 10 days beyond compliance | 20 |
| 11 to 15 days beyond compliance | 50 |
| 16 to 20 days beyond compliance | 9 |
| 21+ days beyond compliance | 42 |
| No calculated timeframe due to no first date | 63 |
| Total | 225 |

REVISION

Compliance is No

| Category | # Svs |
|----------------------------------------------|-------|
| 0 to 5 days beyond compliance | 17 |
| 6 to 10 days beyond compliance | 8 |
| 11 to 15 days beyond compliance | 18 |
| 16 to 20 days beyond compliance | 0 |
| 21+ days beyond compliance | 11 |
| No calculated timeframe due to no first date | 52 |
| Total | 106 |

Although the target for this Indicator is 100% the state did show improvement in the percent of all services provided in a timely manner (**91.7%** in FFY 2005 to **97.0%** in FFY 2006) which shows a significant and moderate increase respectively in the percent of infants and toddlers who receive early intervention services on their IFSP in a timely manner (**74.0%** in FFY 2005 to **86.8%** in FFY 2006).

Further analysis of the data indicates that a few programs are well below the state average in the percent of children who received services in a timely manner and the percent of services provided in a timely manner. Lead Agency staff will develop corrective action plans with those programs below the state average for this indicator.

Public Reporting/Local Determinations

Massachusetts publicly reported local program performance on Indicator # 1 by comparing individual Early Intervention Program performance with the state average and state target in July 2007 and will continue to do so on an annual basis. In addition, data gathered on Indicator # 1 is used in making local determinations.

Focused Monitoring

Programs will be annually grouped and ranked in March based on the number of days the first IFSP service begins after the IFSP signature date. This data is universally collected by all Early Intervention Programs and is obtained by matching EIIS data with Service Delivery data. Low performing programs in each grouping will be selected for an Onsite visit in the priority area of Service Coordination.

Correction of Noncompliance identified in FFY 2005

As reported in FFY 2005 APR Massachusetts identified three Findings of noncompliance related to Indicator # 1. Two Findings of noncompliance were identified through Onsite Focused Monitoring visits in the priority area of Service Coordination, and one through the complaint management system. All three findings have been corrected within the one year timeline through the development of a corrective action plan. Onsite file review data verification demonstrated substantial compliance with the timely provision of services for the two findings identified through Onsite Focused Monitoring visits. Correction of the finding identified through the complaint management system was verified in writing by the Early Intervention Program to the Lead Agency.

Noncompliance identified in FFY 2006

There were six Findings of noncompliance identified in FY 2006 related to Indicator # 1. Four Findings were identified through the Annual Report/Self-Assessment and programs were notified in June 2007 of the noncompliance. An additional two Findings were identified through Focused Monitoring Onsite visits under the Service Coordination priority area. Programs were notified in July 2006 and October 2006 respectively of the noncompliance. Corrective action plans were developed with all six programs and the timely correction of noncompliance will be reported in the FFY 2007 APR.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2007.**Improvement Activities FFY 2007**

The Timeliness of Services Survey section of the FY 2008 Annual Report/Self-Assessment will be distributed to all EIPs in late summer/early fall 2008, separate from the remainder of the Annual Report/Self-Assessment. Service delivery data will be utilized to match program reported IFSP service dates. The Data Manager along with Lead Agency regional staff will review data, send individual reports to all programs with outcome results for local programs to review, edit, make corrections, and provide the appropriate justification for untimely services to ensure more accurate and reliable data.

Timeline: September 2008

Resource: Data Manager/ Lead Agency Regional Staff

New improvement activities noted above are reflected in the Massachusetts Part C State Performance Plan.

Part C State Annual Performance Report (APR) for Federal Fiscal Year (FFY) 2006**Overview of the Annual Performance Report Development:****Monitoring Priority: Early Intervention Services In Natural Environments**

Indicator 2: Percent of infants and toddlers with IFSPs who primarily receive early intervention services in the home or programs for typically developing children.¹

(20 U.S.C. 1416(a)(3)(A) and 1442)

Measurement: Percent = [(# of infants and toddlers with IFSPs who primarily receive early intervention services in the home or programs for typically developing children) divided by the (total # of infants and toddlers with IFSPs)] times 100.

| FFY | Measurable and Rigorous Target |
|----------------------------------------------------------|---------------------------------------|
| FFY 2006 <i>(July 1, 2006 – June 30, 2007)</i> | 99.4% |

Actual Target Data for FFY 2006 (July 1, 2006 – June 30, 2007):

98.5% - based on 14, 651 of 14, 878 children in the 12/1/2006 child count, of children with IFSPs who received their primary services in natural settings.

Data Source – December 1, 2006 Child Count

13,124 (88.2%) Home
1,527 (10.3%) Community-based setting
227 (1.5%) Other setting

14, 878 (100%) Total

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2006.

Indicator # 2 is based on Table 2 of the 618 data (primary setting). Table 2 of the 618 data was revised for the December 1, 2006 child count. Prior to 12/1/06 the categories included the following:

- Program designed for typically developing children
- Program designed for children with developmental delays or disabilities
- Home (inpatient)
- Residential setting

¹ At the time of the release of this package, revised forms for collection of 618 State reported data had not yet been approved. Indicators will be revised as needed to align with language in the 2005 -2006 State reported data collections.

The current 618 collection used “community based settings” rather than “programs for typically developing children” and includes the following categories:

- Home
- Community-based setting
- Other setting

Providing services within natural settings and daily routines has been a strength of the Massachusetts Early Intervention System for many years. The Early Intervention Orientation Training, required of staff working 20 hours or more in the Massachusetts EI system, continues to reflect a commitment to the provision of services in natural environments. In addition the IFSP Core Training has been recently revised to emphasize the importance of developing, with families, functional outcomes that are meaningful and can be addressed within typical family routines. The Program Planning committee of the Interagency Coordinating Council (ICC) previously developed the “Day in the Life” tool to engage families in the discussion of daily routines and natural settings and the Lead Agency continues to support the utilization of that document. **See Attachment A.**

Part C Lead Agency staff participated in the Expanding Opportunities Initiative to promote the inclusion of all children in community based settings. Lead Agency staff will work closely with other state partners in creating a vision for inclusive opportunities for all children birth to five in Massachusetts.

Massachusetts publicly reported local program performance on Indicator # 2, percent of infants and toddlers with IFSPs who primarily receive early intervention in the home or programs for typically developing children, by comparing each EIPs performance with the state average, state target, and other EIPs in similar groupings.

State monitoring data from the Annual Report/Self-Assessment file review verifies the accuracy of the 618 setting data. Out of 590 files reviewed statewide, 578 (**98%**) indicated services were provided in natural settings or had appropriate justification for services not provided in natural settings. Twelve files did not contain documentation or appropriate justification for services. Lead Agency staff will follow up with individual programs to ensure appropriate justification is documented on IFSPs for services not provided in natural settings.

Explanation of Slippage

The state target for FFY 2006 (7/1/06 – 6/30/07) of children with IFSPs who primarily receive services in the home or programs for typically developing children is **99.4%**. The Actual Target data show **98.5%** (14,651 out of 14,878) of children with IFSPs received their primary services in natural settings. This represents a slight increase of 227 in the number of children receiving services other than in the home or other community based settings. A discussion with Stakeholders at the January 10, 2008 ICC meeting attributed the slight slippage to the ongoing need for EI providers to contract out with private agencies for services provided by many of the allied health professionals. Typically these agencies, such as rehabilitation facilities and private clinics, provide only office based services in clinical settings.

The increasing demand and shortage of Speech Language Pathologists, Physical Therapists, and Occupational Therapists over the past few years has resulted in difficulty for EI providers in recruiting and hiring these disciplines. The Massachusetts system has also seen an increase in the number of Fee for Service and part time staff.

The slippage is also attributed to an increased number of more medically complex children requiring more structured settings designed for “EI Only” children, or requiring specialized equipment available only in more clinical settings.

The Lead Agency will continue to support the Massachusetts Early Intervention Consortium (MEIC) to raise the EI unit rate to increase salaries of allied health professional working in the Massachusetts system as well as support ongoing recruitment and retention activities.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2007.

Revisions to Proposed Target

Over the past several years the number of children receiving services in the home and community based settings in Massachusetts has never been below 98%. However, an increased number of enrolled children with significant and complex needs for whom outcomes can not be achieved in a natural setting has attributed to the slight increase in children receiving services in settings other than home or community based. Therefore, based on the discussion with Stakeholders, and the fact that there will always be a small percentage of children for whom early intervention services can more appropriately be delivered in a specialized setting, Massachusetts will change its target for Indicator # 2 to 95% over the remaining four years of the SPP.

Improvement Activities

A new question regarding primary service setting will be added to the IFSP and incorporated into the Early Intervention Information System (EIS) (Reporting for Table 2.618 data). Training will be provided regarding the new data entry requirement.

Timeline: State Fiscal Year 2008

Resource: Data Manager/Lead Agency Staff

Massachusetts Part C Department of Public Health staff in collaboration with the Department of Early Education and Care, Department of Education, Head Start, and Early Head Start submitted an application for a SpecialQuest grant to build upon already existing relationships to create a statewide system to provide quality inclusive opportunities for all young children and their families by embedding the SpecialQuest approach, materials, and resources into professional development and service systems.

Timeline: ongoing
Programs

Resource: Assistant Director Early Childhood

New improvement activities and revised state targets noted above are reflected in the Massachusetts Part C State Performance Plan.

Part C State Annual Performance Report (APR) for Federal Fiscal Year (FFY) 2006

Overview of the Annual Performance Report Development:

Monitoring Priority: Early Intervention Services in Natural Environments

Indicator 3: Percent of Infants and Toddlers with IFSPs who demonstrate improved:

- A.** Positive social-emotional skills (including social relationships;
- B.** Acquisition and use of knowledge and skills (including early language/communication);
- C.** Use of appropriate behaviors to meet their needs

Measurement: A. Positive social-emotional skills (including social relationships):

- a. Percent of infants and toddlers who did not improve functioning = $[(\# \text{ of infants and toddlers who did not improve functioning}) \div (\# \text{ of infants and toddlers with IFSPs assessed})] \times 100$.
- b. Percent of infants and toddlers who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers = $[(\# \text{ of infants and toddlers who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers}) \div (\# \text{ of infants and toddlers with IFSPs assessed})] \times 100$.
- c. Percent of infants and toddlers who improved functioning to a level nearer to same-aged peers but did not reach it = $[(\# \text{ of infants and toddlers who improved functioning to a level nearer to same-aged peers but did not reach it}) \div (\# \text{ of infants and toddlers with IFSPs assessed})] \times 100$.
- d. Percent of infants and toddlers who improved functioning to reach a level comparable to same-aged peers = $[(\# \text{ of infants and toddlers who improved functioning to reach a level comparable to same-aged peers}) \div (\# \text{ of infants and toddlers with IFSPs assessed})] \times 100$.
- e. Percent of infants and toddlers who maintained functioning at a level comparable to same-aged peers = $[(\# \text{ of infants and toddlers who maintained functioning at a level comparable to same-aged peers}) \div (\# \text{ of infants and toddlers with IFSPs assessed})] \times 100$.

If a + b + c + d + e does not sum to 100%, explain the difference.

- B.** Acquisition and use of knowledge and skills (including early language/communication and early literacy):
 - a. Percent of infants and toddlers who did not improve functioning = $[(\# \text{ of infants and toddlers who did not improve functioning}) \div (\# \text{ of infants and toddlers with IFSPs assessed})] \times 100$.
 - b. Percent of infants and toddlers who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers = $[(\# \text{ of infants and toddlers who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers}) \div (\# \text{ of infants and toddlers with IFSPs assessed})] \times 100$.
 - c. Percent of infants and toddlers who improved functioning to a level nearer to same-aged peers but did not reach it = $[(\# \text{ of infants and toddlers who improved functioning to a level nearer to same-aged peers but did not reach it}) \div (\# \text{ of infants and toddlers with IFSPs assessed})] \times 100$.

nearer to same-aged peers but did not reach it) divided by (# of infants and toddlers with IFSPs assessed)] times 100.

- d. Percent of infants and toddlers who improved functioning to reach a level comparable to same-aged peers = [(# of infants and toddlers who improved functioning to reach a level comparable to same-aged peers) divided by (# of infants and toddlers with IFSPs assessed)] times 100.
- e. Percent of infants and toddlers who maintained functioning at a level comparable to same-aged peers = [(# of infants and toddlers who maintained functioning at a level comparable to same-aged peers) divided by (# of infants and toddlers with IFSPs assessed)] times 100.

If a + b + c + d + e does not sum to 100%, explain the difference.

C. Use of appropriate behaviors to meet their needs:

- a. Percent of infants and toddlers who did not improve functioning = [(# of infants and toddlers who did not improve functioning) divided by (# of infants and toddlers with IFSPs assessed)] times 100.
- b. Percent of infants and toddlers who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers = [(# of infants and toddlers who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers) divided by the (# of infants and toddlers with IFSPs assessed)] times 100.
- c. Percent of infants and toddlers who improved functioning to a level nearer to same-aged peers but did not reach it = [(# of infants and toddlers who improved functioning to a level nearer to same-aged peers but did not reach it) divided by the (# of infants and toddlers with IFSPs assessed)] times 100.
- d. Percent of infants and toddlers who improved functioning to reach a level comparable to same-aged peers = [(# of infants and toddlers who improved functioning to reach a level comparable to same-aged peers) divided by the (# of infants and toddlers with IFSPs assessed)] times 100.
- e. Percent of infants and toddlers who maintained functioning at a level comparable to same-aged peers = [(# of infants and toddlers who maintained functioning at a level comparable to same-aged peers) divided by the (# of infants and toddlers with IFSPs assessed)] times 100.

If a + b + c + d + e does not sum to 100%, explain the difference.

Massachusetts reported data on Indicator # 3 using the SPP template. Please refer to revisions reflected in the Massachusetts Part C State Performance Plan.

Part C State Annual Performance Report (APR) for Federal Fiscal Year (FFY) 2006

Overview of the Annual Performance Report Development:

Massachusetts solicited public input from a broad group of Stakeholders, including parents, service providers and program directors to develop a plan for administration and dissemination of the Family Survey. For the initial reporting year of FFY 2005, the Lead Agency utilized sampling methodology and collected sufficient data to meet federal requirements.

The Lead Agency has since systemized the collection of data on Family Outcomes to ensure input and feedback from **all** families whose children receive Early Intervention Services. The Lead Agency acknowledges the multiple demands on EIPs and has worked with Stakeholders to devise an implementation plan that requires the least amount of additional work for programs, and that the information obtained from the Family Survey will be a valuable resource to providers to improve the quality of services for children and families.

The Lead Agency modified the original NCSEAM Survey (**Attachment B: English and Spanish Cover Letter and NCSEAM Family Survey**) to be more reflective of the Massachusetts EI system and has contracted with Piedra Data Systems to produce, disseminate and analyze the surveys. The process is as follows:

- EIPs received a mailing from Piedra Data that contains scannable surveys, explanatory flyers, IRB letters and stamped self addressed envelopes
- Service Coordinators distribute prepared packets to families
- All surveys were returned by families directly to Piedra Data Systems.

The information obtained from the Family Survey has many benefits to local EI programs:

- Opportunity to improve services for children and families receiving Early Intervention.
- Information gathered will be analyzed in the aggregate to meet federal reporting requirements.
- Information will also be disaggregated by program and given to programs annually to support ongoing program planning.
- Information obtained from the Family Survey can be incorporated into ongoing quality assurance plans.
- Completing the Family Survey will educate families about options and opportunities to better meet their needs while still enrolled in EI.

Monitoring Priority: Early Intervention Services In Natural Environments

Indicator 4: Percent of families participating in Part C who report that early intervention services have helped the family:

- A. Know their rights;
- B. Effectively communicate their children's needs; and
- C. Help their children develop and learn.

(20 U.S.C. 1416(a)(3)(A) and 1442)

Measurement:

A. Percent = [(# of respondent families participating in Part C who report that early intervention

services have helped the family know their rights) divided by the (# of respondent families participating in Part C)] times 100.

B. Percent = [(# of respondent families participating in Part C who report that early intervention services have helped the family effectively communicate their children's needs) divided by the (# of respondent families participating in Part C)] times 100.

C. Percent = [(# of respondent families participating in Part C who report that early intervention services have helped the family help their children develop and learn) divided by the (# of respondent families participating in Part C)] times 100.

| FFY | Measurable and Rigorous Target |
|----------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| FFY 2006 <i>(July 1, 2006 – June 30, 2007)</i> | <p><i>Percent of families participating in Part C who report that early intervention services have helped the family:</i></p> <p><i>81% - Know their rights</i></p> <p><i>78% - Effectively communicate their children's needs</i></p> <p><i>87% - Help their children develop and learn</i></p> |

Actual Target Data for FFY 2006:

4a) **74.9% (493 out of 658)** of families reported that early intervention services helped them know their rights.

(95% Confidence Interval: 71.4% – 78.1%)

4b) **71.6% (471 out of 658)** of families reported that early intervention services helped them communicate their child's needs.

(95% Confidence Interval: 68% – 74.9%)

4c) **85.9% (565 out of 658)** of families reported that early intervention services helped them help their child develop and learn.

(95% Confidence Interval: 83.0% - 88.4%)

The survey administered by the Lead Agency included two rating scales developed and validated by the National Center for Special Education and Accountability Monitoring (NCSEAM). The 23 item Impact on Family Scale (IFS) measures the extent to which early intervention helped families achieve positive outcomes, including the three outcomes specified in Indicator # 4.

Surveys were returned by 665 families receiving early intervention services, representing approximately 5% of the total number of surveys distributed to local programs. Of these, 658 provided responses to the IFS. This number is high enough for the estimated statewide percents on the indicator to be within an adequate confidence interval, based on established survey sample guidelines. Massachusetts elected to apply the Part C standards recommended by nationally representative stakeholders group convened by NCSEAM. The recommended standards, established based on item content expressed in the scale, were as follows: for Indicator 4a, know their rights, a measure of 539; for Indicator 4b, effectively

communicate their children's needs, a measure of 556; and for Indicator 4c, help their children develop and learn, a measure of 516.

The Distribution of Race/Ethnicity in the responses of 71% White; 6 % Black and 19% Hispanic is representative of the current Massachusetts EI population. 48.4% of the completed surveys were from families whose children were between the age of 2 – 3 years ; 32.3% were on children between the age of 1 -2 years, and 18% were on children between the birth and 1 year of age.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2006:

With guidance from Stakeholders, the Lead Agency determined that the **six month IFSP Review** represents a good time to distribute the NCSEAM Family Survey. This ensures that every family enrolled in Early Intervention for at least six months will be surveyed, thus reaching children six months to three years of age, and that all families have an opportunity to share thoughts about their EI experience. The Universal IFSP Review page has been modified with a check box to be used as a reminder and tracking tool by program staff. To assist EIPs in distribution of the Survey across the diverse EI system, and to support families to complete the Survey, the following supports and resources were implemented by the Lead agency:

- Information and reminders for families and EIPs about distributing and completing the Survey is provided in every edition of the ***Parent Perspective*** newsletter and on the EI Parent Leadership Project website.
- Parent Liaisons and Parent Contacts may access training that was developed and delivered by the Parent Leadership Project to support families in completing the Survey.
- Programs are encouraged to identify broader agency linguistic and cultural capacity to assist families to complete the Survey.
- Families may call the Parent Leadership Project toll free line for assistance.

The actual target data shows a slight decrease from the targets that were established based on last years dissemination of surveys over a five week period to families whose children were enrolled for at least six months and were transitioning out of early intervention. FFY 2006 data reflects the data captured at the six month IFSP Review over a 12 week period. Next year's data will reflect an entire year's worth of data. The Lead Agency attributes the slight slippage from the initial year to the fact that the Lead Agency provided more guidance and support to programs last year which may have influenced positive responses. In addition, there is a much larger number of respondents to the Survey this year, and families received the Survey at different points in their involvement in Early Intervention and not all at the point of transition.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2007:

The Lead Agency may have been premature in setting targets last year on such a small sample of respondents not large enough to reflect the current EI population in the state. Based on Stakeholder input from the January 10, 2008 ICC meeting the Lead Agency will consider this FFY 2006 data as baseline data for setting targets for FFY 2007 as follows:

Percent of families participating in Part C who report that early intervention services have helped the family:

70% - Know their rights

70% - Effectively communicate their children's needs

85% - Help their children develop and learn

Improvement Activities:

The lead agency will develop and offer Family Rights and Due Process training opportunities to families and professionals in a variety of modalities (face to face, flash videos, DVD's, etc.) Information helping families to more effectively participate in and understand the language of their IFSP is being developed and will be disseminated. An initiative to increase the number of parent contacts, volunteer parents and EI programs is underway. The parent contacts serve as a conduit of information between the Lead Agency and their EI program. Parent contacts share information with families and support them in offering their thoughts, needs and opinion to their programs and the Lead Agency. In FFY07 there will be a focus on understanding family rights and ways of communication children's needs. With support from the ICC, information about the Family Survey and its three components will go out to the larger provider community. This increased knowledge will support families to participate even more broadly within the IFSP process and will serve as another source of information about the three critical components measured by the Family Survey. The Lead Agency will continue to review and adjust its targets as appropriate.

Timeline: 2008 -2009

Resource: Lead Agency Staff to include the Director of Office of Family Initiatives, PLP Training Coordinator, Director of Office of Family Rights and Due Process, Assistant. Director of Early Childhood Programs

The Lead Agency will continue its improvement and/or maintenance activities that extend to 2010. In addition the Lead Agency has revised its Measurable and Rigorous Target in the Massachusetts Part C State Performance Plan for 2005 – 2010 to reflect improvement over the FFY 2006 revised baseline data.

New improvement activities and state targets noted above are reflected in the Massachusetts Part C State Performance Plan.

Part C State Annual Performance Report (APR) for Federal Fiscal Year (FFY) 2006

Overview of the Annual Performance Report Development:

Monitoring Priority: Effective General Supervision Part C / Child Find

Indicator 5: Percent of infants and toddlers birth to 1 with IFSPs compared to:

- A. Other States with similar eligibility definitions; and
- B. National data.

(20 U.S.C. 1416(a) (3) (B) and 1442)

Measurement:

- A. Percent = [(# of infants and toddlers birth to 1 with IFSPs) divided by the (population of infants and toddlers birth to 1)] times 100 compared to the same percent calculated for other States with similar (narrow, moderate or broad) eligibility definitions.
- B. Percent = [(# of infants and toddlers birth to 1 with IFSPs) divided by the (population of infants and toddlers birth to 1)] times 100 compared to National data.

| FFY | Measurable and Rigorous Target |
|----------------------------------------------------------|--------------------------------|
| FFY 2006 <i>(July 1, 2006 – June 30, 2007)</i> | 2.85% |

Actual Target Data for FFY 2006:

Based on the December 1, 2006 child count data, 2,411 (**3.12%**) of infants and toddlers under the age of one residing in Massachusetts have an IFSP which exceeds the FFY 2006 target of **2.85%**. Massachusetts continues to serve one of the highest percentages of children less than one year of age including infants and toddlers at-risk receiving early intervention services at three times the national average.

Comparative Data between National Baseline and Massachusetts for infants served under the age of one, including children at risk of delay:

| National Baseline (12/1/06) | Massachusetts (12/1/06) |
|-----------------------------|-------------------------|
| 1.04% | 3.12% |

Comparative Data for States with **Broad Eligibility** for infants served under the age of one, including children at risk of delay:

| State | # of children served | % Served under one year of age |
|----------------------|----------------------|--------------------------------|
| Hawaii | 1,224 | 6.98% |
| Massachusetts | 2,411 | 3.12% |
| Wyoming | 122 | 1.79% |
| West Virginia | 513 | 2.45% |
| New Mexico | 640 | 2.21% |
| Pennsylvania | 2,466 | 1.71% |

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2006

Data was collected for this Indicator using 618 data of Children Receiving EI services in accordance with Part C – 12/1/2006. Massachusetts ranks 2nd among states with broad eligibility definitions, and actually services more children than the other 24 states having broad eligibility with the exception of Texas, California and Pennsylvania

Child Find data pertaining to Indicator # 5 was discussed at the January 10, 2008 ICC meeting for public input and discussion of growth in the percentage of infant s and toddlers birth to one with IFSPs. In addition the Lead Agency held a “Listening Session” at the November 2007 ICC meeting to discuss ongoing growth in the Massachusetts EI system.

Over the past several years Massachusetts Early Intervention growth has been driven by several factors:

- Increased scientific evidence on the importance of EI services
- Near universal acceptance in Massachusetts by medical providers, insurers, researchers and families that EI services improve outcomes
- Ongoing outreach and child find activities by early intervention providers to referral sources and other community resources to engage hard to reach populations
- Significant increase in the number of toddlers with a diagnosis in the Autism Spectrum.

Additional referrals to the EI system are anticipated through the following screening initiatives:

Act Early – a Center for Disease Control (CDC) campaign to train pediatricians in the ongoing use of developmental screenings (with a focus on autism) in pedi atric practices.

American Academy of Pediatrics (AAP) – recommendation for Primary Care Physicians to screen twice before the age of two for autism.

The Identification and Treatment for Infants & their Families Project (ITIF) – a grant which focuses on the identification of newborns exposed to illegal substances through birthing hospitals, DSS Area Offices, pregnant and parenting women’s substance abuse treatment programs and DPH early intervention programs.

Child Abuse and Prevention Treatment Act (CAPT A) –federal legislation which requires that all states have “provisions and procedures” for the referral to EI for children under age three involved in a supported case of abuse and/or neglect.

First Signs Initiative – a collaboration with Autism Speaks , the nation's leading nonprofit organization devoted to autism , on developing a video glossary that helps parents and professionals identify early signs of autism.

For FY 2008 the Massachusetts EI system is projected to be 3 million dollars overbudget, and costs will continue to increase in FY 2009 by an additional 5.7 million dollars. The Lead Agency has had to propose programmatic changes to the state's eligibility guidelines to address the growth with the potential of increasing the percentage of delay from 25% to 30% in one developmental domain. Given the current fiscal crisis, ICC stakeholders recommended stabilizing the state target for this indicator at 2.85%.

Massachusetts publically reported local program performance on Indicator # 5, the percent of infants and toddlers birth to one with IFSPs compared to the state target and posted the information on the state's website at www.mass.gov/dph/earlyintervention. In addition each program received a local program report highlighting program performance compared to the state target.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2007

Revision to Proposed Targets:

The Lead Agency with input from the ICC stakeholders revised the State Target for Indicator # 5 at 2.85% of infants served under the age of one, including children at -risk of delay, over the remaining period of the SPP. Massachusetts has reasonable justification for the proposed revision in the state's target given that we currently serve three times the national average, and the impending growth and fiscal climate in Massachusetts continue to be an issue.

Revised state targets noted above are reflected in the Massachusetts Part C State Performance Plan.

Part C State Annual Performance Report (APR) for Federal Fiscal Year (FFY) 2006

Overview of the Annual Performance Report Development:

Monitoring Priority: Effective General Supervision Part C / Child Find

Indicator 6: Percent of infants and toddlers birth to 3 with IFSPs compared to:

- A. Other States with similar eligibility definitions; and
- B. National data.

(20 U.S.C. 1416(a)(3)(B) and 1442)

Measurement:

- A. Percent = [(# of infants and toddlers birth to 3 with IFSPs) divided by the (population of infants and toddlers birth to 3)] times 100 compared to the same percent calculated for other States with similar (narrow, moderate or broad) eligibility definitions.
- B. Percent = [(# of infants and toddlers birth to 3 with IFSPs) divided by the (population of infants and toddlers birth to 3)] times 100 compared to National data.

| FFY | Measurable and Rigorous Target |
|----------------------------------------------------------|--------------------------------|
| FFY 2006 <i>(July 1, 2006 – June 30, 2007)</i> | 5.85% |

Actual Target Data for FFY 2006:

Based on the December 1, 2006 child count data, 14,878 (**6.41%**) of infants and toddlers under the age of three residing in Massachusetts have an IFSP, which exceeds the FFY 2006 target of **5.85%**. Massachusetts continues to serve one of the highest percentages of children birth to three including infants and toddlers at-risk receiving early intervention services

Comparative Data between National Baseline and Massachusetts for infants and toddlers birth to three with IFSPs, including children at risk of delay:

| National Baseline (12/1/06) | Massachusetts (12/1/06) |
|-----------------------------|-------------------------|
| 2.43% | 6.41% |

Comparative Data for States with **Broad Eligibility** for infants and toddlers birth to three with IFSPs , including children at risk of delay:

| State | # of children served | % Served under one year of age |
|----------------------|----------------------|--------------------------------|
| Hawaii | 3,970 | 7.48% |
| Massachusetts | 14,878 | 6.41% |
| Wyoming | 926 | 4.55% |
| West Virginia | 2,786 | 4.41% |
| New Mexico | 3,077 | 3.58% |
| Pennsylvania | 14,957 | 3.43% |

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2006

Data was collected for this Indicator using 618 data of Children Receiving EI services in accordance with Part C – 12/1/2006. Massachusetts ranks 2nd among states with broad eligibility definitions, and actually services more children than the other 24 states having broad eligibility with the exception of Texas, California and Pennsylvania

As noted in Indicator # 5, Massachusetts presented Child Find data pertaining to indicator # 6 at the January 10, 2008 ICC meeting for public input and discussion regarding growth in the percent of infants and toddler birth to three with IFSPs. In addition the Lead Agency held a “Listening Session” at the November 2007 ICC meeting to discuss ongoing growth in the Massachusetts EI system.

Even though the state exceeded its target of 5.85%, and given the current growth and fiscal challenges facing the Massachusetts EI system, stakeholders recommended stabilizing the state target for Indicator # 6 at 5.85% for the remainder of the SPP

In addition to the potential increase in the number of referrals and children served in the Massachusetts Part C program noted in Indicator # 5, additional referrals may be identified through the Rosie “D” state remediation plan that requires behavioral health screening of MassHealth eligible children during well child visits. Primary Care Providers will conduct behavioral health screenings using standardized tools and make referrals to appropriate community agencies including Early Intervention for infants and toddlers.

Massachusetts publicly reported local program performance on Indicator # 6, the percent of infants and toddlers birth to three with IFSPs compared to the state target and national average on the state’s website at www.mass.gov/dph/earlyintervention. In addition each program received a local program report highlighting program performance compared to the state target.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2007

Revision to Proposed Targets:

The Lead Agency with input from the ICC stakeholders revised the State Target for Indicator # 6 at 5.85% of infants and toddlers birth to three, including children at-risk of delay, over the remaining period of the SPP. Massachusetts has reasonable justification for the proposed revision in the state’s target given we will exceed the national average of children served, and the impending growth and fiscal climate in Massachusetts continues to be an issue.

Revised state targets noted above are reflected in the Massachusetts Part C State Performance Plan.

Part C State Annual Performance Report (APR) for Federal Fiscal Year (FFY) 2006

Overview of the Annual Performance Report Development:

Monitoring Priority: Effective General Supervision Part C / Child Find

Indicator 7: Percent of eligible infants and toddlers with IFSPs for whom an evaluation and assessment and an initial IFSP meeting were conducted within Part C's 45 -day timeline.

(20 U.S.C. 1416(a) (3) (B) and 1442)

Measurement: Percent = [(# of eligible infants and toddlers with IFSPs for whom an evaluation and assessment and an initial IFSP meeting was conducted within Part C's 45-day timeline) divided by the (# of eligible infants and toddlers evaluated and assessed)] times 100.
Account for untimely evaluations.

| FFY | Measurable and Rigorous Target |
|----------------------------------------------------------|--------------------------------|
| FFY 2006 <i>(July 1, 2006 – June 30, 2007)</i> | 100% |

Actual Target Data for FFY 2006:

Initial evaluation and IFSP meetings were conducted in FY 2007 (7/1/06 – 6/30/07) on 12,846 children and of those 12,191 or **94.9%** were held within Part C's 45 day timeline.

Based on FY 2007 (7/1/06 – 6/30/07) data:

9,427 (**73.4%**) of initial IFSP meetings occurred within 45 days of referral.

2,764 (**21.5%**) of initial IFSP meetings did not occur within 45 days of referral, but had appropriate documentation of delays as extraordinary family circumstances. These were included in the numerator and denominator.

655 (**5.1%**) of initial IFSP meetings did not occur within 45 days of referral and did not have appropriate justification for delay.

Total 12,846 = 100%

Extraordinary Family circumstances include the following:

- Child hospitalized
- Difficulty contacting the family
- Family requested delay

- Family schedule
- Unable to contact the family
- Sick child
- No Shows

The 655 IFSP meetings that were held more than 45 days from referral were delayed due to programmatic issues, with reasons including staff shortages, staff scheduling and staff illness .

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2006:

The target for the FFY 2006 APR is 100% and although the state did not meet its target, Massachusetts did show progress toward its target with 94.9% of eligible infants and toddlers with IFSPs for whom an evaluation and assessment and initial IFSP meeting were conducted within Part C's 45 day timeline.

Further drill down and analysis of the data show that 15 Early Intervention Programs were 100% compliant with this Indicator and the Lead Agency will publicly recognize those programs for their efforts; two Early Intervention programs were identified as being well below the state average at 36.4% and 43% and corrective action plans will be requested and developed with these programs to ensure timely correction of noncompliance within 12 months of identification. Systemic issues related to the low performance in this Indicator for these two programs were staff shortages and scheduling difficulties.

In FY 2006, programs identified as out of compliance in this area through Contract Performance Review and/or the Annual Report/Self Assessment were required to develop a corrective action plan that must address the noncompliance as soon as possible but no later than one year from identification.

Focused Monitoring - The Lead Agency continues to monitor evaluation, assessment and IFSP meetings within 45 days of referral through Onsite Focused Monitoring in the priority indicator of Service Coordination.

Data Verification - Data verification for accuracy and reliability of EIS data on this indicator is also completed during Onsite Focused Monitoring visits.

Public Reporting - Massachusetts publicly reported local program performance on Indicator # 7 on the Lead Agency's website at www.mass.gov/dph/earlyintervention and data will continue to be reported on an annual basis. In addition, local program reports were distributed to each EIP highlighting program performance on the percent of eligible infants and toddlers with IFSPs for whom an evaluation and assessment and initial IFSP meeting were conducted within Part C's 45 day timeline.

Correction of Noncompliance identified in FFY 2005

In FFY 2005 EIS/Contract Performance Review data was not utilized to identify areas of noncompliance; however it was used to identify programs for targeted technical assistance. This data is now being used to identify noncompliance for FFY 2006 and for Local Determinations.

In FFY 2006 EIS/Contract Performance Review data identified three Findings of noncompliance in this Indicator. Early Intervention Programs were notified by the Lead Agency in May 2007 and corrective action plans are currently being developed. Timely correction of noncompliance for these three Findings will be reported in the FFY 2007 APR.

**Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines /
Resources for FFY2007:**

Not Applicable

Part C State Annual Performance Report (APR) for Federal Fiscal Year (FFY) 2006

Overview of the Annual Performance Report Development:

Monitoring Priority: Effective General Supervision Part C / Effective Transition

Indicator 8: Percent of all children exiting Part C who received timely transition planning to support the child's transition to preschool and other appropriate community services by their third birthday including:

- A. IFSPs with transition steps and services;
- B. Notification to LEA, if child potentially eligible for Part B; and
- C. Transition conference, if child potentially eligible for Part B.

(20 U.S.C. 1416(a)(3)(B) and 1442)

Measurement:

- A. Percent = [(# of children exiting Part C who have an IFSP with transition steps and services) divided by the (# of children exiting Part C)] times 100.
- B. Percent = [(# of children exiting Part C and potentially eligible for Part B where notification to the LEA occurred) divided by the (# of children exiting Part C who were potentially eligible for Part B)] times 100.
- C. Percent = [(# of children exiting Part C and potentially eligible for Part B where the transition conference occurred) divided by the (# of children exiting Part C who were potentially eligible for Part B)] times 100.

| FFY | Measurable and Rigorous Target |
|----------------------------------------------------------|--------------------------------|
| FFY 2006 <i>(July 1, 2006 – June 30, 2007)</i> | 100% |

Actual Target Data for FFY 2006:

ORIGINAL SUBMISSION

Indicator 8a: - 97.5% (2,737 out of 2,808) of all children exiting Part C have an IFSP with transition steps and services.

REVISION

Indicator 8a: - 96.6% (13,621 out of 14,099) of all children discharged during fiscal year 2007 had a completed transition plan on the IFSP.

The Annual Report/Self-Assessment collected information for LEA-referred discharged children on whether they had an individualized transition plan on the IFSP. This information was compared to Massachusetts' EI data system (EIS) on all discharged IFSP children to ensure the reliability of EIS data in capturing data on children having a "fully developed transition plan". The data for this question on the Annual Report/Self-Assessment for 2,808 discharged children follows:

2,677 (95.3%) stated the same response on both the Annual Report/Self -
Assessment and EIIS
66 (2.4%) stated different responses on the Annual Report/Self -
Assessment and EIIS
65 (2.3%) had an unknown response on either the Annual Report/Self -
Assessment or in EIIS
=====
2,808 (100%)

Given that 95.3% stated the same response on both data sets the EIIS data was used for responding to this section of the indicator. The results follow:

11,521 (81.7%) Yes
2,100 (14.9%) No, but acceptable reason
478 (3.4%) No
=====
14,099 (100%)

96.6% of IFSP children discharged during fiscal year 2007 had a completed transition plan on the IFSP.

The reasons for responses that stated "No" but had a justifiable reason included the following:

- Abrupt discontinuation of service
- Family situation (e.g., moved)
- Unable or difficult contacting the family
- Family refused or discontinued services

Reason for slippage: Massachusetts' percentage of 98.3% for last year was based only on LEA - referred children on data received from the Annual Report/Self -Assessment. This data set is perceived by providers to be tied more closely to program performance and, therefore, the inclusion of justification reasons is better documented within this data set. Massachusetts believes that the percentage of children having a completed transition plan on the IFSP is higher than what is stated in EIIS due to the misconception of what a "fully developed" transition plan entails for children under 24 months of age. Many responses in EIIS stated "No" with a justification being "young child" or "child is only 18 months". Massachusetts believes that these children more than likely had an individualized transition plan that was appropriate for the child at their age. These responses, however, remained "No" under this indicator. **See SPP/APR Indicator 8 Transition Grid below.**

ORIGINAL SUBMISSION

Indicator 8b: - 95% (2,669 out of 2,808) of all children exiting Part C and potentially eligible for Part B where notification to the LEA occurred.

REVISION

Indicator 8b: - 94.7% (2,660 out of 2,808) of all children exiting Part C and potentially eligible for Part B where notification to the LEA occurred. Based on feedback from OSEP the state may not exclude children who were referred for EI services after 33 months in their calculation. This revision resulted in 10 children being moved out of the "No, but OK" category and into the "No" category. The state percentage of 94.7% continues to be higher than last year's percent of 80.4%.

ORIGINAL SUBMISSION

Indicator 8c: - 98.4% (2,762 out of 2,808) of all children exiting Part C and potentially eligible for Part B where a transition planning conference occurred.

REVISION

Indicator 8c: - 98.4% (2,762 out of 2,808) of all children exiting Part C and potentially eligible for Part B where a transition planning conference occurred. OSEP's calculation of these data using the correct measurement is 88.5%. However, further follow up by Lead agency staff with local EIPs regarding the 277 (9.9%) of Transition Planning Conferences that occurred but were outside the 90 day timeline were due to the family choice to hold the meeting when the LEA could attend and participate in the meeting thus resulting in the meeting being held outside of the timeframe. The Lead Agency will continue to provide guidance to local EIPs on holding Transition Planning Conference with the 90 day timeframe and accurately reporting family circumstances.

**SPP/APR INDICATOR 8: Transition
FFY 2006/FY 2007**

Data source: 618 data, Table 3 (Exiting) for FY 2006 - Only children discharged and referred to an LEA

The following children were excluded from Table 3 (Exiting):

- o Children having an IFSP but never received ongoing IFSP services
- o Children under the age of three
- o Children not referred to an LEA

ORIGINAL SUBMISSION

THIS YEAR (FY 2007)

| Category | 8a | | 8b | | 8c | |
|----------------------------|---------------------|--------|---------------|--------|--------------|--------|
| | Completed Tran Plan | | LEA Notified* | | TPC Occurred | |
| | # Kids | % Kids | # Kids | % Kids | # Kids | % Kids |
| Yes | 2,583 | 92.0% | 2,469 | 87.9% | 1,519 | 54.1% |
| Yes, but outside timeframe | | | | | 277 | 9.9% |
| No, but acceptable reason | 154 | 5.5% | 200 | 7.1% | 966 | 34.4% |
| No | 71 | 2.5% | 139 | 5.0% | 46 | 1.6% |
| Total | 2,808 | 100.0% | 2,808 | 100.0% | 2,808 | 100.0% |

*49.8% of children served in the Boston EI programs had a LEA notification sent

Total compliant

2,737 97.5% 2,669 95.0% 2,762 98.4%

REVISION

THIS YEAR (FY07)

| Category | 8a | | 8b | | 8c | |
|----------------------------|---------------------|--------|---------------|--------|--------------|--------|
| | Completed Tran Plan | | LEA Notified* | | TPC Occurred | |
| | # Kids | % Kids | # Kids | % Kids | # Kids | % Kids |
| Yes | 11,521 | 81.7% | 2,469 | 87.9% | 1,519 | 54.1% |
| Yes, but outside timeframe | | | | | 277 | 9.9% |
| No, but acceptable reason | 2,100 | 14.9% | 191 | 6.8% | 966 | 34.4% |
| No | 478 | 3.4% | 148 | 5.3% | 46 | 1.6% |
| Total | 14,099 | 100.0% | 2,808 | 100.0% | 2,808 | 100.0% |

*49.8% of children served in the Boston EI programs had a LEA notification sent

Total compliant

13,621 96.6% 2,660 94.7% 2,762 98.4%

Massachusetts
State

Yes, but outside timeframe

| Category | # Kids | % Kids |
|---------------------------------------------|--------|--------|
| within 1 week of compliancy timeframe | 59 | 21.3% |
| within 2 to 3 weeks of compliancy timeframe | 72 | 26.0% |
| within 4 to 6 weeks of compliancy timeframe | 80 | 28.9% |
| > 6 weeks outside of compliancy timeframe | 66 | 23.8% |
| Total | 277 | 100.0% |

LAST YEAR (FY 2006)

| Category | 8a | | 8b | | 8c | |
|---------------------------|---------------------|--------|---------------|--------|--------------|--------|
| | Completed Tran Plan | | LEA Notified* | | TPC Occurred | |
| | # Kids | % Kids | # Kids | % Kids | # Kids | % Kids |
| Yes | 3,211 | 96.3% | 2,441 | 73.2% | 2,835 | 85.0% |
| No, but acceptable reason | 67 | 2.0% | 239 | 7.2% | 422 | 12.7% |
| No | 57 | 1.7% | 655 | 19.6% | 78 | 2.3% |
| Total | 3,335 | 100.0% | 3,335 | 100.0% | 3,335 | 100.0% |

*49.8% of children served in the Boston EI programs had a LEA notification sent

Total compliant

3,278 98.3% 2,680 80.4% 3,257 97.7%

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2006:

The Lead Agency once again used data collected from the Transition Survey of the FY 2007 Annual Report/Self Assessment, based on children discharged and referred to an LEA. The transition information captured in the Annual Report/Self Assessment has enabled the Lead Agency to accurately capture Part C transition requirements and local program performance on this Indicator. The Lead Agency provided additional clarity and guidance to providers regarding Part C transition requirements to ensure complete and comprehensive transition plans, LEA notification and Transition Planning Conferences.

The Department of Early Education and Care (EEC) in collaboration with the Lead Agency the Massachusetts Department of Public Health held two Transition Workshops in April 2007 to review Part C and Part B/Section 619 Pre-School Special Education requirements and improve transitions.

In September 2007, the DPH and EEC completed and disseminated a guide to transition, co-authored by the DPH and EEC, written for parents, early childhood educators, LEAs and EIPs. **See Attachment C, Best Practices in Early Childhood Transition: A Guide for Families.** Each EIP and school district received on hard copy of the guide and the PDF file to make copies and disseminate to staff and families. Over the next year DPH and EEC will offer joint training and technical assistance to EIPs and LEAs to support transition work. In addition, a breakout session on implementing smooth transitions was held at the ICC Retreat in October, 2007.

8a) IFSPs with Transition Steps and Services

The Lead Agency revised the Universal IFSP Transition Page to reflect the required transition activities to ensure a successful transition from Part C to next step service. **See Attachment D Universal IFSP January 2008, pages 7a and b.**

The Transition Plan of the IFSP has been expanded to three pages to include a review of options for families; information for parents regarding the process of transition; support available to parents; and information to be sent to the LEA and/or other community providers. The plan outlines activities and tasks to be performed by both the family and Early Intervention staff to ensure a smooth transition. Local Early Intervention programs are required to complete pages 7a for all children regardless of age or the child's potential eligibility for Part B. The EIS discharge form as well as the Transition Survey of the Annual Report/Self Assessment captures whether fully developed Transition Plans to prepare the child and family for next step services are in place at the time of discharge.

The Actual Target data for FFY 2006 of **97.5% (2,737 out of 2,808)** of all children exiting Part C who have an IFSP with transition steps and services illustrates a slight decrease from 98.3% reflected in the FFY 2005 APR, to come into full compliance with the Indicator. Some of the reasons stated for not having a complete transition plan in place included the following: family situation (moved); lost contact with the family; difficulty contacting the family; family discontinued services; and data errors. The introduction of the revised Transition plan of the IFSP will better capture the reasons why a complete transition plan was not in place with the addition of the question – Transition plan was not completed for the following reason(s). In addition, the Transition Survey in the FY 2008 Annual Report/Self Assessment will include a drop down menu for reasons why a transition plan was not completed.

Focused Monitoring

Transition continues to be one of the key priority areas in the Focused Monitoring process. Complete and comprehensive transition plans are monitored through onsite file review protocols.

In FFY 2005 there were two Findings identified through Focused Monitoring onsite visits regarding complete and comprehensive Transition Plans. Programs with Findings were notified in April 2006 and June 2006, and corrective action plans were developed with the Lead Agency. Technical assistance was provided by the Lead Agency in the form of training highlighting federal and state transition requirements, and correction of noncompliance was verified through onsite file reviews.

The Lead Agency publicly reported on Indicator 8a in July 2007. In addition, local program reports were disseminated to each EIP highlighting program performance on the percent of children exiting Part C with IFSPs with transition steps and services.

8b) LEA Notification for children potentially eligible for Part B

The Actual target data, for FFY 2006 of **95% (2,669 out of 2,808)** of children exiting Part C and potentially eligible for Part B where LEA notification occurred demonstrates significant improvement and progress in this Indicator. As noted above, the Lead Agency provided extensive information and training on federal transition requirements specifically regarding LEA notification and "opt out". Regional training and guidance was provided in November and December 2006. Additionally, a conference call was sponsored by the Lead Agency in May 2007 to provide additional clarity and respond to questions from providers. The Universal IFSP Transition Plan has been revised to capture the Date of Notification to the Local Education Agency (LEA), and parental "opt out". See page 7b of Attachment D

Documented reasons for why the LEA was not notified of children potentially eligible for Part B include the following; family did not want LEA referral; child determined age appropriate; and late referral to EI (after 33 months).

Regional Lead Agency staff will follow up with those local programs where LEA notification did not consistently occur. Targeted technical assistance has occurred with the Early Intervention Programs

in the Boston region, and policies and procedures have been implemented to ensure LEA notification of children potentially eligible for Part B services occurs on a consistent basis.

Focused Monitoring

Transition continues to be a key priority area in the Focused Monitoring process. LEA Notification is monitored through onsite file review protocols.

The Lead Agency publicly reported on Indicator 8b in July 2007. In addition, local program reports were disseminated to each EIP highlighting program performance on the percent of children exiting Part C where LEA Notification occurred.

8c) Transition Planning Conferences

The Actual target data for FFY2006 of **98.4% (2,762 out of 2,808)** of children exiting Part C and potentially eligible for Part B where transition planning conferences occurred demonstrates continued improvement and progress in this Indicator. Progress is attributed to ongoing training and technical assistance provided by the Lead Agency regarding Transition Planning Conferences. The Early Intervention Operational Standards define Transition Planning Conference as “***The required meeting that is held with a child and/or his/her family, and documented on the Transition Page of the IFSP, at least 90 days and up to 9 months prior to the child’s third birthday. The purpose of the conference is to inform the family about all possible transition options and to prep are the family for termination of EI services.***” The Massachusetts EI system requires a Transition Planning Conference on all children exiting Part C. The Lead Agency only reported data on those children potentially eligible for Part B for Indicator 8c.

Documented reasons of exceptional family circumstances for the 966 children and families where a Transition Planning Conference did not occur included the following; family schedule, LEA schedule, parent declined meeting; family moved; family requested delay; and family waived meeting.

277 (9.9%) of Transition Planning Conferences that occurred but were outside the 90 day timeline were due to complications or scheduling issues with LEAs. Early Intervention Programs make every effort to invite and notify the LEA of the Transition Planning Conference, but in many instances the LEA can not attend due to lack of personnel and resources. EIPs are required to convene the TPC even if LEA participation does not occur.

Focused Monitoring

Transition continues to be a key priority area in the Focused Monitoring process. Transition Planning Conferences are monitored through onsite file review protocols. There was one Finding in FFY 2005 identified through the Focused Monitoring process regarding Transition conferences on all children potentially eligible for Part B. The program was notified in June 2006 and a corrective action plan was developed with Lead Agency staff. Technical assistance was provided by Lead Agency staff regarding federal transition requirements and the program implemented policies and procedures to ensure that Transition conference are documented on the Transition Plan of the IFSP.

The Lead Agency publicly reported on Indicator 8c in July 2007. In addition, local program reports were disseminated to each EIP highlighting program performance on the percent of children exiting Part C where transition planning conference occurred.

In FFY 2006 there were 3 Findings of noncompliance related to this Indicator. Two were identified through the Focused Monitoring process and one was identified based on a Formal written complaint regarding the failure to comply with transition requirements for a child transitioning from one EIP to another. Corrective actions plans were requested and programs were required to implement appropriate transition policies and procedures. Timely correction of noncompliance will be addressed in the FFY 2007 APR submission.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2007:

Improvement Activities:

The updated Interagency Transition Agreement between the DPH, Head Start, DOE, and EEC is completed and is currently being reviewed at the senior management level at DOE. Once finalized and disseminated this agreement will provide guidance to EIPs and local school districts on transition requirements and will promote timely transitions. DPH and EEC staff will provide additional guidance to providers regarding the Interagency Agreement.

Timeline: 2008

Resource: Lead Agency Staff/Part B 619 Coordinator

In response to OSEP's request Massachusetts has developed a Transition Policy (**See Attachment E**) that includes the Interagency Transition Agreement, opt-out provisions, and defines (Part B) "potentially eligible children". The Lead Agency has obtained stakeholder input and feedback on the Transition Policy and will obtain informal review from OSEP prior to the submission of the SPP/APR. The draft Transition Policy will also be submitted as part of the 22nd Year Part C Application for additional comment.

Timeline: January – May, 2008

Resource: Lead Agency Staff

Massachusetts Lead agency staff are currently collaborating with the Northeast and North Central Regional Resource Centers to develop an online Transition Training to support EI program staff in providing effective transition services to children who are exiting Part C and entering Part B special education services. The training will help personnel in recognizing the critical components of transition and in taking appropriate steps to support children and families in the process. The online training will be required of all new services coordinators working in the EI system. The Lead agency staff will partner with EEC to determine if the training will be required of Part B staff as well.

Timeline: FY 2008

Resource: Assistant Director Early Childhood Programs/CSPD Coordinator/619 Coordinator

New improvement activities noted above are reflected in the Massachusetts Part C State Performance Plan.

Part C State Annual Performance Report (APR) for Federal Fiscal Year (FFY) 2006

Overview of the Annual Performance Report Development:

The Lead Agency will make numerous changes and enhancements to its General Supervision system to ensure compliance with federal requirements through statewide training and technical assistance and monitoring of Massachusetts 59 community based Early Intervention Programs to address issues of noncompliance. Local program data will be collected regularly, and the state will continue to utilize multiple methods for data verification to ensure the accuracy and reliability of data.

The Assistant Director of Early Childhood Programs presented information and solicited input on the Massachusetts Local Determinations process at the June 14, 2007 ICC meeting and at the October 4, 2007 ICC Retreat. Also, the Lead Agency's Newsletter "*The Update*" featured an article in the August 2007 edition on Local Determinations to ensure providers had an understanding and knowledge of the process and had an opportunity to provide input into the process.

In addition, a Focused Monitoring Stakeholders meeting occurred on August 16, 2007 to provide input into the current Focused Monitoring process. As a result of this meeting Massachusetts will be revising its process to reflect changes described under the Revised Improvement Activities. The shift to a Focused Monitoring approach to onsite monitoring has enabled DPH staff to ensure correction of noncompliance in a timely manner by tracking correction and improvements through onsite data verification visits. Sanctions in the Massachusetts system focused on strategies for improvement and corrective actions with specific timelines. Incentives will include highlighting promising practices on the DPH website and in the Parent Leadership Project Newsletter (Parent Perspective) that is distributed to all 59 EI programs as well as 3,000 families throughout the EI system.

The Massachusetts overview of Focused Monitoring in General Supervision and State Monitoring of Local Programs document will be updated by April 1, 2008 to reflect revisions in the Focused Monitoring process and include the Local Determinations process.

Any areas of noncompliance identified through the Massachusetts Annual Report/Self Assessment, Onsite Focused Monitoring visits, Early Intervention Information System (EIIS) Data system , Annual Contract Performance Review and Dispute Resolution system will be corrected as soon as possible but in any case no later than one year from identification.

Monitoring Priority: Effective General Supervision Part C / General Supervision

Indicator 9: General supervision system (including monitoring, complaints, hearings, etc.) identifies and corrects noncompliance as soon as possible but in no case later than one year from identification.

(20 U.S.C 1416 (a) (3) (B) and 1442)

Measurement: Percent of noncompliance corrected within one year of identification:

- a. # of findings of noncompliance.
 - b. # of corrections completed as soon as possible but in no case later than one year from identification.
- Percent = [(b) divided by (a)] times 100.

For any noncompliance not corrected within one year of identification, describe what actions, including technical assistance and/or enforcement that the State has taken.

| FFY | Measurable and Rigorous Target |
|--------------------------------------------------------------|--------------------------------|
| FFY 2006 <i>(July 1, 2006 – June 30, 2007)</i> | 100% |

Actual Target Data for FFY 2006 (July 1, 2006 – June 30, 2007):

100% - The target data was obtained from the Massachusetts General Supervision system including Focused Monitoring Onsite visits and the state's Dispute Resolution system. As reported in the FFY 2005 APR there were 12 Findings non-compliance in five programs and 12 out of 12 were corrected within 12 months as noted in **Attachment F, Indicator 9 Table**. The Indicator 9 Table presents disaggregated data by APR Indicator on the status of timely correction of the noncompliance findings identified by Massachusetts during FFY 2005. A data review was conducted for all 61 Early Intervention Programs in FY 2005, four programs were selected for Focused Monitoring onsite visits two in the area of Service Coordination and two in the area of Transition, and one program had a written parent complaint filed.

Please see Indicator 9 Table (aggregated from the Massachusetts 2005 SPP data)

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2006:

A. Percent of non-compliance related to Monitoring Priority Areas and Indicators corrected within one year of identification.

Indicator #1 - Percent of infants and toddlers with IFSPs who receive the early intervention services on their IFSPs in a timely manner.

In FFY 2005, four programs received an Onsite Focused Monitoring visit. Two programs were identified as having Findings under the monitoring priority of timely provision of services. The Massachusetts EI system defines **"timely services" as those that occur within, and do not exceed, 30 days from the IFSP signature date.**

During the onsite file reviews two programs did not consistently provide IFSP services within the states definition of 30 days from parental consent. One program was notified of the noncompliance in March 2006 and indicated the noncompliance was due to staffing issues at the program. A corrective action plan was developed to provide training and technical assistance to staff regarding the state definition of "timely services", and to change Intake and Evaluation procedures and policies to ensure ongoing timely provision of services. The second program was notified of the noncompliance in May 2006, and again noted noncompliance was occurring due to staff shortages. Additional retention and recruitment strategies were implemented along with staff training to come into compliance. Onsite file review data verification visits by Lead Agency staff and matching of service delivery data with progress notes confirmed compliance with timely provision of services within 12 months of notification to the programs.

Indicator # 7 – Percent of infants and toddlers with IFSPs for whom an evaluation and assessment and initial IFSP were conducted within the Part C 45 day timeline.

In FFY 2005 EIS/Contract Performance Review data was not utilized to identify areas of noncompliance; however it was used to identify programs for targeted technical assistance. This data is now being used to identify noncompliance for FY 2006 and for Massachusetts Local Determinations.

Indicator # 8 – Percent of all children exiting Part C who received timely transition planning to support the child's transition to pre-school and other appropriate community services by the 3rd birthday.

In FFY 2005 four programs received Onsite Focused Monitoring visits. Two programs were identified as having three Findings related to Transitions activities. There were two Findings related to complete and comprehensive transition plans identified during onsite file reviews and one Finding regarding Transition Planning Conferences on children potentially eligible for Part B. The two programs where Findings occurred were notified in April 2006 and June 2006 respectively. Identification of noncompliance was due to the program's lack of understanding of the federal transition requirements. Individual program technical assistance and training was provided by the Lead Agency staff around effective transition practices. In addition, the Lead Agency staff provided additional clarity and guidance to providers regarding the Part C transition requirements and further defined complete and comprehensive transition plans, LEA notification and Transition Planning Conferences. The Lead Agency staff confirmed substantial compliance and correction of noncompliance through periodic onsite record review to verify and confirm compliance with Federal Transition Requirements in April 2007, and June 2007.

B. Percent of Noncompliance related to areas not included in the above monitoring priority areas and indicators corrected within one year of identification.

In FFY 2005 there were six Findings of noncompliance made in two areas not included in 9A.

1. IFSP Development

During the Focused Monitoring Onsite visit in the priority area of Service Coordination one program had **two Findings of noncompliance**. One Finding was related to the assignment and participation in the initial IFSP meeting of a Service Coordinator; the other pertained to written notification of IFSP meetings. The reason for program noncompliance was due to lack of knowledge of federal requirements regarding the timely assignment of Service Coordinator and prior written notice for **all** IFSP meetings. The Program was notified in March 2006, and a corrective action plan was developed. The agency revised the IFSP form and provided training to staff regarding federal and state requirements regarding assignments of the Service Coordinator, and the Lead Agency introduced the Universal Written Notice of the IFSP meeting. The program made substantial progress and came into compliance as verified by onsite data verification visit in March 2007.

An **additional Finding** related to complete, individualized initial IFSPs are developed with families was identified in March 2006 through an Onsite Focused Monitoring visit. File review identified initial IFSPs with same services and no individualization based on child and family outcomes. A corrective action plan was developed and training and technical assistance was provided to the program regarding "individualized" services on the IFSP. A data verification visit by Lead Agency staff in January 2007 showed the required evidence of change – complete, comprehensive individualized initial services on IFSPs on all new referrals beginning 7/1/06.

2. Family Rights/Due Process

Onsite Focused Monitoring visits on Service Coordination identified noncompliance in March 2006 in obtaining parental consent for changes in IFSP services due to lack of understanding by the program regarding family rights and due process. Training and technical assistance was provided to the program by Lead Agency staff on the use of the IFSP review page to obtain

appropriate consent prior to initiating any changes in IFSP services. The issue was corrected in October 2006, as evidenced through onsite file review.

In addition, the Onsite Focused Monitoring visit in one program identified that families were not given a full explanation of their Rights. A corrective action plan was developed and a training was provided by the Lead Agency Director of Family Rights and Due Process was completed in January 2007. The program implemented changes to the Intake Process to ensure explanation of Family Rights is provided during the IFSP Development process.

An Onsite Focused Monitoring visit in the Transition priority area in April 2006 identified that complete and signed releases of information were not present in the child's record prior to contact with outside collateral agencies. A corrective action plan was developed and technical assistance and training was provided to program staff by the Lead Agency staff regarding the legal implications of file maintenance and documentation of correction of noncompliance through record review in October 2006 verified complete signed releases of information present prior to contact with outside agencies.

C. Percent of noncompliance identified through other mechanism (complaints, due process hearings, mediations, etc.) corrected within one year of identification.

One agency had a written formal complaint filed related to Indicator # 1, timely provision of services identified in March 2006. The complaint centered on the provision of agreed upon IFSP services. A corrective action plan was developed based on the parents' suggested remedy to (1) immediately resume the services that parent consented to on the IFSP and (2) provide compensatory services for the period the service was not provided due to staff shortages. Both activities were completed by August 2006.

In FFY 2006 the Massachusetts General Supervision system identified 15 Findings of noncompliance through the FY06 Annual Report/Self Assessment, Onsite Focused Monitoring and the Dispute Resolution system. These FY 2007 Findings in the areas of timely services, IFSP meetings within 45 days, and Federal Transition requirements are reported in the FFY 2006 APR under each Indicator.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2007

Improvement Activities FFY 2007

1. **Determinations:** Local Determinations were made in the Fall of 2007 and will be made as soon as possible each year after the APR data disaggregated to the program level in preparation for public reporting. The determinations will not be included in the public reporting

Timeline: Ongoing

Resource: Data Manager & DPH Regional Staff

2. **Focused Monitoring:** The Lead Agency hosted a Focused Monitoring Stakeholders meeting on August 16, 2007 to discuss and gather input on proposed changes to the Focused Monitoring process in the following areas:

Scheduling Cycle – change in the onsite visit schedule from a calendar year to a fiscal year to commence in July 2008.

Program Groupings – revised program groupings according to size of the program based on children with IFSPs, FY07 cumulative. Each program grouping has 12 Early Intervention Programs.

Priority Areas/Indicators – Stakeholders were in favor of keeping the current priority areas.

Data Sources – Change will be made to the Transition data source used for onsite selection to – “the percent of children moving to Part B services who had a transition planning conference”. Data will be collected through the Annual Report/Self-Assessment transition survey.

Onsite Protocols – onsite protocols will be revised to capture the necessary data in each of the priority indicators.

Timeline: June 2008

Resource: Assistant Director Early Childhood Programs, Parent Team Coordinator, Lead Agency Regional Staff.

3. The Massachusetts Overview of Focused Monitoring in General Supervision and State Monitoring of Local Programs document will be updated to include the changes to the Focused Monitoring Process and to also include the Local Determinations process .

Timeline: April 2008

Resource: Assistant Director Early Childhood Programs

4. The Assistant Director of Early Childhood Programs and DPH regional staff will work closely with the Data Manager to enhance the EIS data collection capacity to track identification of noncompliance regarding timely provision of services, IFSP meetings within 45 days and transition requirements.

Timeline: Ongoing

Resource: Data Manager/DPH Lead Agency staff

New improvement activities noted above are reflected in the Massachusetts Part C State Performance Plan.

Part C State Annual Performance Report (APR) for Federal Fiscal Year (FFY) 2006

Overview of the Annual Performance Report Development:

Massachusetts has an effective Dispute Resolution system in place, which is overseen by the Director, of the Office of Family Rights and Due Process. The Director works closely with the Assistant Director of Early Childhood Programs to ensure that families know their rights, complaints are handled in a timely manner, there is a system in place to track issues and that issues identified from the complaint management system inform the states' onsite and offsite monitoring activities.

Monitoring Priority: Effective General Supervision Part C / General Supervision

Indicator 10: Percent of signed written complaints with reports issued that were resolved within 60 -day timeline or a timeline extended for exceptional circumstances with respect to a particular complaint.

(20 U.S.C. 1416(a)(3)(B) and 1442)

Measurement: Percent = [(1.1(b) + 1.1(c)) divided by 1.1] times 100.

| FFY | Measurable and Rigorous Target |
|--------------------------------------------------------------|--------------------------------|
| FFY 2006 <i>(July 1, 2006 – June 30, 2007)</i> | 100% |

Actual Target Data for FFY 2006:

100% of signed written complaints received by the Lead Agency had reports issued within 60 days. The data source for this Indicator is from the data collected on Table 4 of Information Collection 1820 - 0678 (*Report of Dispute Resolution Under Part C of the Individuals with Disabilities Education Act*). See Attachment G Table 4.

The lead agency received three written signed complaints related to compliance with IDEA regulations. Only one complaint was substantiated with a Finding of noncompliance related to IDEA regulations. An overview of the complaint is highlighted under Indicator # 8, Effective Transition. The signed complaint was received by the lead agency on May 3, 2007. The report of conclusions, based on findings was issued on 7/2/07. Confirmation by USPS is verification that the delivery occurred on 7/3/07.

Reports of the two nonsubstantiated complaints were issued within the 60 day timeframe. One complaint was received by the Lead Agency on March 7, 2007. The report of a finding of noncompliance with the Massachusetts Early Intervention Due Process and Procedural Safeguard Standards of providing the parent within five days of the request, a list of the types and locations of records collected and maintained or used by the provider was issued on May 7, 2007.

The other formal administrative complaint received on March 27, 2007 alleges a violation to adherence to the 45 day timeline and the timely provision of service. Review of all available materials (including a file review and e-mail exchanges forwarded to this office by both the parent and the program director) did not yield a finding of non-compliance to either allegation. The program was found not out of compliance with the Early Intervention Operational Standards which states that a parent residing in the catchment area that had more than one Early Intervention program be informed of the other programs within the catchment area. The report narrative was issued by fax to both the program and parent on May 25, 2007. Receipt of the narrative was confirmed by both phone and fax transmittal sheet.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2006:

In addition to fulfilling the requirements of IDEA with respect to complaints related to compliance, the Lead Agency continues to offer families the option to file complaints on matters alleged to be inconsistent with the Massachusetts Early Intervention Operational Standards. These have resulted in onsite investigations, findings and/or quality improvement plans or opportunities for providing technical assistance relating to policies or practices associated with health and safety standards, parent involvement, and facility standards.

The Lead Agency Director, Office of Family Rights and Due Process, has developed model language for written notices, consents and family rights as a means of ensuring that consistent and accurate information related to procedural safeguards and family rights is available systemically.

Full implementation of the universal consents and notices was completed in July 2007.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2007

Family Rights and Due Process training targeted for parents will be developed by the Lead Agency utilizing various modalities. Training may include face to face opportunities, conference calls, webinars, and Flash videos to review and discuss procedural safeguards. Additionally, periodic articles written for the Parent Perspective, a newsletter offered by the Parent Leadership Project will occur in FY08.

Timeline – FY 2008

Resource: Director, Office of Family Rights and Due Process/Lead Agency Staff

New improvement activities noted above are reflected in the Massachusetts Part C State Performance Plan.

Part C State Annual Performance Report (APR) for Federal Fiscal Year (FFY) 2006

Overview of the Annual Performance Report Development:

Monitoring Priority: Effective General Supervision Part C / General Supervision

Indicator 11: Percent of fully adjudicated due process hearing requests that were fully adjudicated within the applicable timeline.

(20 U.S.C. 1416(a)(3)(B) and 1442)

Measurement: Percent = [(3.2(a) + 3.2(b)) divided by 3.2] times 100.

| FFY | Measurable and Rigorous Target |
|----------------------------------------------------------|--------------------------------|
| FFY 2006 <i>(July 1, 2006 – June 30, 2007)</i> | 100% |

Actual Target Data for FFY 2006:

Not Applicable – There were no due process hearing requests during the reporting period. The data source for this Indicator is from the data collected on Table 4 of Information Collection 1820 -0678 (*Report of Dispute Resolution Under Part C of the Individuals with Disabilities Education Act*). See Attachment G.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2006:

The Lead Agency has secured, via state contract an additional hearing officer. As a hearing officer with the Bureau of Special Education Appeals, she is proficient with Part B Regulations and the Massachusetts Rules of Adjudicatory Practice and Procedure. Orientation to the Part C regulations and the Massachusetts Early Intervention Operational Standards was provided by the Director of the Office of Family Rights and Due Process. The additional hearing officer broadens the resources of the Lead agency to address dispute resolution sought through due process hearing.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2007:

Not Applicable

Part C State Annual Performance Report (APR) for Federal Fiscal Year (FFY) 2006

Overview of the Annual Performance Report Development:

Monitoring Priority: Effective General Supervision Part C / General Supervision

Indicator 12: Percent of hearing requests that went to resolution sessions that were resolved through resolution session settlement agreements (applicable if Part B due process procedures are adopted).

(20 U.S.C. 1416(a)(3)(B) and 1442)

Measurement: Percent = (3.1(a) divided by 3.1) times 100.

| FFY | Measurable and Rigorous Target |
|--------------------------------------------------------------|--------------------------------|
| FFY 2006 <i>(July 1, 2006 – June 30, 2007)</i> | N/A |

Actual Target Data for FFY 2006:

Not Applicable – Indicator does not apply to Part C in Massachusetts. Currently, Massachusetts Early Intervention operationalizes standards consistent with Part C due process procedures and has not adopted Part B procedures. Resolution sessions are not included in the states' due process and procedural safeguards.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2006:

Not Applicable

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2007:

Not Applicable

Part C State Annual Performance Report (APR) for Federal Fiscal Year (FFY) 2006

Overview of the Annual Performance Report Development:

Per guidance from OSEP, we are not answering this question as we have not reached the threshold of 10 mediation requests.

Monitoring Priority: Effective General Supervision Part C / General Supervision

Indicator 13: Percent of mediations held that resulted in mediation agreements.

(20 U.S.C. 1416(a)(3)(B) and 1442)

Measurement: Percent = $[(2.1(a)(i) + 2.1(b)(i)) \text{ divided by } 2.1] \text{ times } 100.$

| FFY | Measurable and Rigorous Target |
|----------------------------------------------------------|--------------------------------|
| FFY 2006 <i>(July 1, 2006 – June 30, 2007)</i> | N/A |

Actual Target Data for FFY 2006:

Not Applicable – There were no mediations held in the reporting period.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2006:

Not Applicable – The Director of the Office of Family Rights and Due Process continues to be available to the mediators at the Bureau of Special Education Appeals to provide ongoing training and technical assistance related to updates to the Early Intervention system.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2007:

Not Applicable

Part C State Annual Performance Report (APR) for Federal Fiscal Year (FFY) 2006

Overview of the Annual Performance Report Development:

Monitoring Priority: Effective General Supervision Part C / General Supervision

Indicator 14: State reported data (618 and State Performance Plan and Annual Performance Report) are timely and accurate.

(20 U.S.C. 1416(a) (3) (B) and 1442)

Measurement: State reported data, including 618 data, State performance plan, and annual performance reports, are:

- a. Submitted on or before due dates (February 1 for child count, including race and ethnicity, settings and November 1 for exiting, personnel, dispute resolution); and
- b. Accurate (describe mechanisms for ensuring error free, consistent, valid and reliable data and evidence that these standards are met).

| FFY | Measurable and Rigorous Target |
|----------------------------------------------------------|--------------------------------|
| FFY 2006 (July 1, 2006 – June 30, 2007) | 100% |

Actual Target Data for FFY 2006:

95.6% of state reported data were submitted on time and were accurate. The Data Source for the Actual Target was obtained utilizing the Self-Scoring Rubric for Part C – Indicator # 14. **See Attachment H.** The Massachusetts data system provides cross-system validation through the use of service delivery data to validate EIS data to ensure valid and reliable data for 618 and SPP Indicators.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2006:

Explanation of Slippage:

As noted in the Indicator 14 Scoring Rubric all 618 data was submitted on time except for Table 2 Program Settings which was due on February 1, 2007. This report was submitted on March 1, 2007. The lateness in the submission of this table was due to an oversight on the part of the data manager.

Massachusetts is aware of the new timeline for reporting Table 2, Program Settings, and will submit this and all reports on or before the due date.

The OSEP APR Response letter addressing the FFY 2005 SPP/APR indicated that Massachusetts submitted invalid entry-level data due to incorrect measurements. Therefore, a score of "0" was placed under the "Correct Calculation" column of the Scoring Rubric for SPP/APR Indicator # 3. Additional information for Indicator # 3 regarding the revised measurements for the 5 reporting categories is detailed in the SPP.

Discussion of Improvement Activities :

Massachusetts has several sources of data that are used for reporting 618 and SPP/APR indicator data. Policies and procedures have been developed over time and continue to be enhanced to address data quality assurance and ensure accuracy of data received from EI contracted providers prior to submission of this data to the Department of Public Health.

DATA SOURCES

The data sources and assurances of data integrity and reliability for these data for the Massachusetts Early Intervention system include:

Early Intervention Information System (EIIS); EIIS consists of multiple applications used to submit client registration, discharge, and service data from EI contracted providers to the Department of Public Health. Client level data reported in the SPP/APR indicators and 618 data tables is based on the information submitted through this system. Tables #1, #2, and #3 of the 618 data set and SPP/APR Indicators #2, #3, #5, #7, #8 are based on client level data collected from EIIS. The following system validation practices are in place to ensure data accuracy:

- Validation for completeness and record logic is built into data transmission applications used for sending client and service data to the Department of Public Health. These validations are updated whenever necessary.
- Additional business rules at the Department of Public Health are implemented that pend payments to providers if certain client data is missing. Improvements to these business rules are ongoing.
- Service delivery data is used to validate EIIS data to ensure valid and reliable data for 618 and SPP Indicators. For example, the client's date of referral is verified against the first service date to ensure accurate data. Individuals with inconsistent data are called to "clean up" these issues.
- Error Reports are generated approximately every other month and mailed to providers with the expectation that client data is reviewed and "cleaned". Error reports are utilized to identify programs in need of technical assistance around data entry issues as well as to highlight commendable practices. An IFSP lateness error report was generated during the past fiscal year.

Annual Report/Self-Assessment: This report is sent to EI contracted providers in the late fall and is used by them to verify their agency's practices and protocols regarding data verification and quality assurance. It is also used to provide data for Indicators #1 and #8 of the SPP/APR. The following procedures were added to this year's report to enhance data accuracy:

- The data collection tool provides formatting functions so that the data entered is in a correct format (e.g., dates).

- The data from providers is reviewed by the Department of Public Health on two different levels and follow-up back to providers is done for reports that contain gross inconsistencies or questionable information.

NCSEAM Family Survey: The Impact on Family Scale (IFS) and the Family-Centered Services Scale (FCSS) were developed by the National Center for Special Education Accountability Monitoring (NCSEAM) to provide states with valid and reliable instruments to measure (a) positive outcomes that families experience as a result of their participation in early intervention and (b) families' perceptions of the quality of early intervention services. Items were developed with substantial input from families and other key stakeholders across the country. This data system is used to provide data for SPP/APR Indicator # 4.

Dispute Resolution system: The Director of the Office of Family Rights and Due Process follows up with parents and providers, and completes onsite file reviews to ensure the accuracy and reliability of data being reported. This data system is used to provide data for Table #4 of 618 and SPP/APR Indicator #10.

SPP/APR DATA QUALITY PRACTICES

Massachusetts has data collection plans and quality assurance practices for each of the 618 tables and SPP/APR Indicators.

SPP/APR Indicator #1: Data for this indicator is provided through Massachusetts Annual Report/Self-Assessment. This year's data collection tool provided drop-down selections, calculations to identify non-compliant responses, and formatting functions so that the data entered is in a correct format (e.g., dates). The data from providers is reviewed by the Department of Public Health and follow-up back to providers is done for reports that contain gross inconsistencies or questionable information.

Table #2 of 618 and SPP/APR Indicator #2: Data for this indicator is gathered from the EIIS service information. Service information is highly reliable due to the fact that services are closely tied to payments. Service data is validated prior to submission to the Department of Public Health from provider agencies. Additional business rules are applied once received by the Department with the potential of pending payments. Updates are done prior to releasing payments. The Department is in contact with the different practice management system developers to ensure that file format and content standards are adhered to.

Table #1 of 618 and SPP/APR Indicators #5 and #6: Two review reports of this data is mailed to all EIPS for correction of missing or incomplete data prior to submission of 618 child count data. In addition, programs are required to review program settings data to ensure reliability of data used for federal reporting purposes.

Table #4 of 618 and SPP/APR Indicator # 10:

SPP/APR Indicator #7: The EIIS IFSP client data form has been enhanced by including several reasons for lateness of the first IFSP meeting. In this way, clinicians are able to check off a response instead of writing in a response that is then left to the interpretation of the data entry person. One of the Error reports that is generated for providers includes a report of children who show that the first IFSP meeting was past 45 days from the referral date and have not included a reason. Providers are expected to review this report and address missing information. A summary report as well as a report that lists the children deemed non-compliant in meeting the 45-day standard, is sent to providers as part of this state's performance reporting. These reports provide EI programs with a sense of the areas to be addressed in order to meet this standard for all children. In order to verify IFSP lateness based on EIIS client data, a file review capturing the date of the first IFSP meeting is completed annually and used to compare with EIIS data to validate this information.

Table #3 of 618 and SPP/APR Indicator #8: Extensive training of EI contracted providers regarding transition issues has been ongoing over the past year and a half. Data for this indicator is provided through Massachusetts' Annual Report/Self-Assessment. This year's data collection tool provided drop-down selections, calculations to identify non-compliant responses, and formatting functions so that the data entered is in a correct format (e.g., dates). The data from providers is reviewed by the Department of Public Health and follow-up back to providers is done for reports that contain gross inconsistencies or questionable information.

ADDITIONAL DATA QUALITY PRACTICES

The Department of Public Health provides needed and appropriate trainings, communications and reports to the EI community and the public to improve the quality of services and confirm the adherence to standards and practices regulated by the lead agency. Some of these include:

Ongoing training and communication – The Data Manager and other lead agency staff provide trainings and other appropriate communications to EI providers to ensure everyone has the same definitions and tools. The Department of Public Health provides help desk support to all providers regarding data applications and functions, policies for data reporting and needed application system training due to turnover within the EI community.

Verification Report – The Annual Report/Self-Assessment includes a data verification report to be completed by providers. This data is matched to the EIS client system and provides a percentage of data accuracy for several data areas. This information will be included as a determination of program performance for the spring 2008 Local Determinations report.

Provider and Public Reports – The Department of Public Health has provided EI programs with annual Performance Measures reports that provide programs with information about how well they are doing compared to the state in a number of data reporting areas. These reports will be replaced with the Local Determinations reports. These public reports of Local Program Performance comparing all local EI programs to the state target and average has increased provider awareness of the importance of reporting consistent, reliable and valid data.

Service Delivery Reports – DPH regional staff do onsite data verification during Focused Monitoring visits on 10 programs per year to ensure that services identified on the IFSP and in progress notes match with Service Delivery data.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2007:

The lead agency will engage in a number of improvement activities over the next year to increase data quality. These activities are also stated within the State Performance Plan:

SPP/APR Indicator #1: The survey within the Annual Report/Self-Assessment that is used to provide data for this indicator will be distributed to EI contracted providers in the early fall of 2008 instead of the late fall. This will allow the Department of Public Health to identify and follow-up with providers regarding incomplete and questionable data. Providers will have the time to review their reports and update or explain any missing or incomplete data.

Timeline: Fall 2008

Resource: Data Manager/Asst. Dir. Early Childhood

Table #2 of 618 and SPP/APR Indicator #2: The Data Manager and Assistant Director of Early Childhood Programs will pursue EIS enhancements to include a primary setting question on the IFSP EIS Form. This data will be used for Table #2 of the 618 data set and Indicator #2 of the SPP/APR.

Massachusetts

State

The IFSP data captured within EIIS can then be matched against service data in order to validate and ensure consistency of information across data systems.

Timeline: January 2009 to July 2009

Resource: Data Manager/Asst. Dir. Early Childhood

SPP/APR Indicator #4: Family Outcomes – The Lead Agency will continue to utilize the NCSEAM Family Survey as a valid and reliable instrument to measure family outcomes and ensure data quality for this information.

Timeline: Ongoing

Resource: Director of Office of Family Initiatives/Asst. Dir. Early Childhood

Table #1 of 618 and SPP/APR Indicators #5 and #6: Massachusetts will continue with its current practices for ensuring data quality for this information.

Timeline: NA

Resource: Data Manager/Asst. Dir. Early Childhood

SPP/APR Indicator #7: Massachusetts will continue with its current practices for ensuring data quality for this information.

Timeline: NA

Resource: Data Manager/Asst. Dir. Early Childhood

Table #3 of 618 and SPP/APR Indicator #8: The Data Manager and Assistant Director of Early Childhood Programs will pursue EIIS enhancements to include transition questions (LEA notification, Opt-out, and Transition Planning Conference) on the EIIS client system. This will enable the Department of Public Health to capture this data on an ongoing basis. Validation reports will be developed within the EIIS system to identify incomplete, illogical and inconsistent information for these questions. This data will replace the use of the Annual Report/Self-Assessment transition section.

Timeline: January 2009 to July 2009

Resource: Data Manager/Asst. Dir. Early Childhood

The lead agency will begin onsite verification visits with programs based on APR Indicator Data and local determinations. First onsite visit to occur March 2008.

Timeline: March 2008 and ongoing

Resource: Focused Monitoring Team

New improvement activities noted above are reflected in the Massachusetts Part C State Performance Plan.